

United States District Court

NORTHERN

DISTRICT OF AUG 25 2004

CALIFORNIA

UNITED STATES OF AMERICA

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

V.

JOHN DOE aka KARL JULIUS DIXON

CRIMINAL COMPLAINT

4-04-0150 WDB
CASE NUMBER:

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.
On or about May 11, 2004, in Alameda County, in the Northern District of CALIFORNIA, the Defendant did

SEE ATTACHMENT "A", INCORPORATED HEREIN BY REFERENCE

in violation of Title 18 United States Code, Section 1542.

I further state that I am a Special Agent of the U.S. State Department of State and that this complaint is based on the following
facts:
Official Title

SEE ATTACHED AFFIDAVIT MADE A PART HEREOF

PENALTIES: SEE ATTACHMENT "A"

APPROVED
AS TO FORM:

James E. Keller
AUSA JAMES E. KELLER

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

PROCESS REQUESTED: NO BAIL WARRANT

Sworn to before me and subscribed in my presence,

8-25-04

Date

at

Oakland, California
City and State

WAYNE D. BRAZIL
United States Magistrate Judge

Name & Title of Judicial Officer

Wayne D. Brazil
Signature of Judicial Officer

Document No.

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District Court
Criminal Case Processing

ATTACHMENT A

Violation

On or about May 11, 2004, John Doe; a.k.a. Karl Julius Dixon, did willingly and knowingly make a false statement in an application for passport with intent to induce and secure the issuance of a passport under the authority of the United States for his own use or use of another, contrary to the laws regulating issuance of passports or the rules prescribed pursuant to such laws, in violation of Title 18 United States Code Section 1542.

Maximum Penalties:

10 years imprisonment; \$250,000 fine; 3 years supervisory release; and \$100 special assessment, pursuant to 18 U.S.C. § 1542.

AFFIDAVIT

NORTHERN DISTRICT OF CALIFORNIA

CITY OF OAKLAND, COUNTY OF ALAMEDA

)
) ss.:
)

I, Lawrence E. Woody, being duly sworn, depose and state:

1. That I am a Special Agent with the United States Department of State, Diplomatic Security Service (DSS) for two years and am currently assigned to the San Francisco Field Office. In my current position, my responsibilities include conducting investigations of criminal violations of Title 18, United States Code Section 1542, as well as other applicable federal statutes enforced by the U.S. Department of State, involving U.S. Passports and Visas.

2. I have personally participated in this investigation, and am thus familiar with the facts and circumstances of the case. The following information is based upon my own investigation, communications with other U.S. Department of State agents and officials, communications with officials and employees of the State of Louisiana Office of Vital Records, and a review of relevant U.S. Department of State records, Federal Bureau of Investigations (FBI) records, U.S. Social Security records (SSA), and the State of California Department of Motor Vehicles (DMV) records as well.

3. This affidavit is submitted in support of a criminal complaint against JOHN DOE aka KARL JULIUS DIXON, charging him with willfully and knowingly making false statements in an application for a United States Passport with intent to induce or secure the issuance of a passport under the authority of the United States, either for his own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws, in violation of Title 18 United States Code Section 1542.

FACTS SUPPORTING PROBABLE CAUSE:

4. On or about May 11, 2004, an investigation was initiated upon receipt of information from Richard Macias, Fraud Program Manager, U.S. Passport Agency, 95 Hawthorne Street, San Francisco, California concerning suspected passport fraud. I examined the official U.S. Passport Agency records, which revealed that:

a. On or about May 11, 2004, an individual identifying himself as Karl Julius Dixon, born on November 18, 2004 in New Orleans, Louisiana executed passport application number 057459065 at the San Leandro, California Post Office before an employee authorized to accept passport applications. The person submitting the passport application executed the form under oath, beneath the following jurat: "I solemnly swear (or affirm) that the statements made on this application are true and the photograph attached is a true likeness of me."

b. The passport application reflects a Certification of live Birth in the name of Karl Julius Dixon, showing birth on November 18, 1984 office of vital records Louisiana birth number 119-1984-072-00217 was submitted with the passport application as proof of citizenship.

c. The passport application also reflects that the applicant stated his Social Security number to be 439-55-6893 and provided a State of California driver license (# D3521388) to establish his identity.

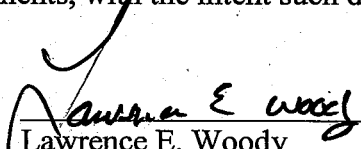
5. In reviewing the passport application as part of a normal administrative procedure, a passport adjudicator detected fraud indicators on the application and referred the application to the Fraud Program Manager in San Francisco.

6. On or about June 4, 2004, the Louisiana office of vital records verified that a birth certificate (#119-1984-072-00217) in the name of Karl Julius Dixon was on file.

7. On or about June 4, 2004, a Law Enforcement check with the Social Security Administration revealed a Social Security Card # 439-55-6893 was issued in the name of Karl Julius Dixon on July 11, 1985.

8. On or about August 19, 2004, Karl Julius Dixon was contacted and interviewed by Special Agent Lawrence E. Woody. During the course of the interview, Dixon admitted to the illegal sale of his identity to a Nigerian business associate. Dixon, who is an admitted pimp and drug dealer, stated he came into contact with the imposter through an illegal prostitution business. After several illegal prostitution transactions, the imposter purchased Karl Julius Dixon's identity in attempt to defraud the U.S. government by committing passport fraud through identity theft.

9. On the basis of the above information, your affiant has reason to believe there is probable cause that JOHN DOE aka KARL JULIUS DIXON knowingly made false statements in his application for a U.S. passport in violation of Title 18, United States Code Section 1542, and knowingly possessed false identification documents, with the intent such documents would be used to defraud the United States Government.


Lawrence E. Woody
Special Agent
U.S. Department of State
Diplomatic Security Service

SWORN AND SUBSCRIBED TO BEFORE ME
THIS 25 DAY OF AUGUST, 2004


United States Magistrate Judge Wayne D. Brazil